

**Responses to RIDEM'S Review Comments**  
**Draft Final Phase III Remedial Investigation IR Program Site 07, Calf Pasture Point**  
**Naval Construction Battalion Center**  
**Davisville, Rhode Island**

**COMMENT 4: Page 2-9 & 10, Section 2.4.1.2, Sample Analysis; Whole Section.**

Please state for the reader, in the text, what modifications were made to EPA Methods 3810, 8010, and 8020.

**RESPONSE:** These methods were modified as stated in the Work Plan addendum.

**COMMENT:** Even though the modifications are stated in the Work Plan addendum for the readers understanding a brief discussion of these modifications to these tests should be provided within this section of the RI since it is unlikely they would refer to the Work Plan addendum.

**RESPONSE:** Most readers do not know the details of any of these analytical methods, let alone the modifications. Therefore, the text will be revised to read, that the analyses were performed in accordance with the work plan.

**COMMENT 5: Page 2-14, Section 2.4.5, Well Development; Paragraph 2, Sentence 8.**

This sentence states that development of the well continued until the turbidity was less than 100 NTU. 100 NTU is a very turbid water. Please explain why the development did not occur until the turbidity was much lower such as 5 or 1 NTU.

**RESPONSE:** Some wells seemed to reach a point at which further reduction in turbidity did not seem feasible. It was assumed that the low flow sampling method and field filtering would further aid in the reduction of the turbidity in the future collection of a sample for chemical analysis.

**COMMENT:** The above explanation needs to be added to the text of the RI. It is not clear, however, how the low flow sampling method would aid in the future collection of samples.

**RESPONSE:** The above explanation will be added to the text.  
The low flow sampling method results in exerting less stress on a sampled zone than bailers or submersible pumps, and therefore, cause less sampling-induced turbidity.

**COMMENT 10: Page 5-13, Section 5.2.2.5, BOD/COD; Whole Section**

The Navy notes that for this phase of the investigation BOD/COD was not evaluated. Since the Navy is proposing no further action the evaluation of this parameter would seem prudent to determine if the contaminants are amenable to degradation.

**RESPONSE:** If natural attenuation is considered, BOD/COD will be considered for inclusion in potential sampling program.

**COMMENT:** Since the Navy has proposed a natural attenuation alternative with a monitoring program, BOD/COD must be included in the monitoring program.

**RESPONSE:** The Navy has not proposed a natural attenuation alternative.

**COMMENT 11: Page 5-14, Section 5.2.3.2, Site Topography and Atmospheric Mixing; Paragraph.**

This paragraph notes that the evaluation of the site and adjacent area ranges from MSL to 20 ft. The 55 ft high rock outcrop should also be noted.

**RESPONSE:** The reviewer has changed the wording in this paragraph. Actually the referenced paragraph is correct as stated and is meant to be related to the area where the DANC was released and areas down gradient.

**COMMENT:** This paragraph deals with atmospheric mixing (air). The sentence in question reads "Site topography, and the topography of adjacent areas, can influence atmospheric mixing at site." While the DANC disposal area may be down gradient from the rock outcrop from a groundwater standpoint it is not necessarily down gradient from an air standpoint since shifting winds could cause the outcrop to be up gradient, side gradient, etc., from the disposal area. Therefore, the 55 ft elevation of the rock outcrop which is an adjacent area, should also be noted.

**RESPONSE:** The 55-ft elevation of the rock outcrop is located more than 400 ft north of the inferred DANC release area, and therefore, is not considered as "an adjacent area". Further, the topography of Calf Pasture Point is flat to very gently sloping, except for the anomaly this one bedrock hill. The elevation of this hill is not appropriate to include in this simplistic calculation.

**COMMENT 13: Page 5-30, Section 5.3.7.3. Plume Extension Under Allen Harbor -**

**VOC; Paragraph 1.**

This paragraph states that the model was used to extend the VOC concentration 1000 feet beyond the shoreline. Please be advised that samples from the harbor will be needed to validate the model. This may be undertaken as part of the groundwater studies to be done for the Allen Harbor Landfill. Therefore, the State does not agree, at this time, that a no further action is prudent for this site.

**RESPONSE:** Sediment samples were collected from Allen Harbor and the Entrance Channel during the Marine Ecological Risk Assessment in the areas adjacent to Site 07 where discharge may be expected when a saline water wedge is considered. No definitive connection/pathway from Site 07 was apparent.

**COMMENT:** RIDEM still believes that samples from the Allen Harbor will be needed to validate the groundwater model. While no apparent connection/pathway of the plume from Site 07 has been shown to be a risk for human and ecological risk at this point in time the potential still exists. With an appropriate monitoring plan and institutional controls the Navy's proposed remedy for this site may be acceptable.

**RESPONSE:** Additional ground-water modeling will not be performed because it will not provide data that will lessen the related uncertainties. However, a conceptual LTM is being prepared for the final version of the Site 07 feasibility study report.

**COMMENT 19: Table 6-3, Selection of Chemicals of Concern from List of Detected Analytes in Sediments.**

Please be advised that many of the Risk-Based Concentrations noted in this Table are higher than the soil standards in the Site Remediation regulations which are also risk-based. This is particularly true of the metals. The values in this column should be changed to reflect the more conservative Rhode Island standard where it is applicable.

**RESPONSE:** Table 6-3 is revised to address reviewer's comments. Wherever necessary, RIDEM's direct exposure criteria is compared against the maximum concentration detected at the site in onsite media or in selected offsite media (sediment and shellfish in the intertidal zone adjacent to the site).

**COMMENTS:** Elimination of chemicals from the risk assessment is only warranted if the list of chemicals of potential concern is unmanageable. This is not the case at Calf Pasture Point and the State questions the utility of applying this procedure. Please be advised that in the future, this procedure should

only be applied when warranted. Finally, the State is aware that historically Region III numbers were used for screening chemicals in a risk assessment. Currently, other lists are available for this process. Therefore, Region IX numbers should be used or where appropriate, RIDEM numbers may be employed.

**RESPONSE:**

The Navy notes RIDEM's advice regarding performance of future risk assessments.